

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Elizabeth Freeman	:	
	:	Chapter 13
	:	
	:	
Debtor	:	No.: 18-13303JKF

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY MARINER FINANCE LLC

COMES NOW, Debtor, Elizabeth Freeman, hereinafter referred to as “Debtor,” by and through her undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by Mariner Finance LLC “Movant”, and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied.
6. Denied. By way of further response, it is specifically requested that undersigned Counsel be provided with a post-petition payment history.
7. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: November 30th, 2018

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
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